

US EPA ARCHIVE DOCUMENT

Transmitted via Electronic Mail

Mr. Chris Black
U.S. Environmental Protection Agency – Region 5
Land and Chemicals Division
77 W. Jackson Blvd. DE-97
Chicago, IL 60604-3590

Subject:

Fourth Quarter 2012 Progress Report (No. 6)
Revitalizing Auto Communities Environmental Response (RACER) Trust
Buick City Site, Flint, Michigan

Dear Mr. Black:

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this Fourth Quarter 2012 Progress Report (No. 6) in accordance with Section VI (18b) of the RACER Trust's Administrative Order on Consent (Consent Order), Docket Number RCRA-05-2011-0024 for the Buick City Site located in Flint, Michigan (the Site), which was effective on September 29, 2011.

Please note that in accordance with General Motors Corporation's Administrative Order on Consent Number R8H-5-00-02 for the North American Operations [NAO] Flint Operations Site (also known as Buick City) Quarterly Progress Reports No. 1 through 46 were submitted to the United States Environmental Protection Agency (EPA) documenting Site activities from January 1, 2000 through June 30, 2011.

This Fourth Quarter 2012 Progress Report (No. 6) covers the period of October 1, 2012 through December 31, 2012.

The following briefly summarizes the work performed and data collected, problems encountered, project schedule, and estimated percent complete for a list of activities.

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ENVIRONMENT

Date:

January 11, 2013

Contact:

Micki M. Maki, P.E.

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Our ref:

B0064410.2012

1. Data Collected This Quarter

The samples collected as part of Site investigation or monitoring activities during this quarter are discussed below. This data will be presented to the EPA in the 2012 Annual CMI Report, except as noted below.

1.1 Storm Sewer Water Samples

In October, November, and December ARCADIS conducted the "NPDES Plus" Monitoring Program (NPMP) as described in the 2011 Annual Corrective Measures Implementation (CMI) Report. The NPMP consists of collecting monthly samples from the 11 Site storm sewers to monitor groundwater infiltrating into the Site storm sewers. The following 11 monitoring points were sampled as access allowed: MP001, MP002, MP003, MP004, MP005, MP006, MP007, MP009, MP010, MP011, and MP013.

From October to December 2012, as required per Part 1, Section A 2 in the current National Pollution Discharge Elimination System (NPDES) Permit No. MI0001597, weekly composite samples were collected from Monitoring Point 003A. The samples were submitted to the laboratory for analysis of total PCBs. This data will be included in the 2012 Yearly Pollutant Minimization Plan (PMP) for PCBs report, which will be submitted to the MDEQ as required in the NPDES permit.

1.2 Soil Samples

In October ARCADIS collected soil samples as part of the Northern Parcel Investigation. Soil samples were collected from eight boring locations and submitted for laboratory analysis of volatile organic compounds (VOCs), semi-volatiles organic compounds (SVOCs), Metals, and PCBs. This data will be submitted in a brief memo report.

In December ARCADIS collected soil samples as part of the AOI 29 surface cover Investigation. Soil samples were collected from four boring locations and submitted for laboratory analysis of lead. This data will be submitted in a brief memo report.

1.3 Groundwater Samples

In October ARCADIS collected groundwater samples as part of the Northern Parcel Investigation. Groundwater samples were collected from five wells and submitted for

laboratory analysis of VOCs, SVOCs, Metals, and PCBs. This data will be submitted in a brief memo report.

In November ARCADIS conducted the Annual Groundwater Monitoring Event as described in the 2011 Annual Corrective Measures Implementation (CMI) Report. Groundwater samples were collected from 50 monitoring wells and submitted for laboratory analysis of laboratory analysis of VOCs, select Metals, and/or PCBs.

2. Work Performed This Quarter

Attachments 1, 2, and 3 present the monthly Site progress reports for October, November, and December which document the work performed this quarter.

3. Problems Encountered

While coordinating the installation of the AOI 09-B MPE treatment system there have been significant delays while securing natural gas service. The system has been installed; however, it cannot be operated until the gas service has been connected and temperatures return above freezing.

4. Project Schedule – Near-Term Milestone Activities Anticipated During the Next Quarter

4.1 Routine Work

Task 1 Outfall 003/004 Oil Removal Systems

- Continue OMM inspections of system.

Task 6 Maintain Booms on Outfalls

- Continue to perform inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Dispose of waste as necessary.
- Continue to performed inspections of Oil Interceptor #2.

Task 8 NPDES PLUS Monitoring

- Perform NPMP monitoring in January, February, and March.

Task 10 Maintain Select Surface Covers

- Perform quarterly inspection of surface cover.

Task 12 Agency Coordination/Negotiation, Reporting, Project Management

- Continue to participate in regulatory agency calls.
- Prepare Quarterly Report for submittal to EPA.

Task 13 Outfall 002/005 Oil Minimization & Investigation

- Continue inspections of booms placed in Outfall 002 and 005 manholes.
- Continue quarterly P-trap inspections.

Task 15 LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation

- Begin OM&M phase of AOI 09-B LNAPL remediation system.

4.2 Non-Routine Work

Task 2 LNAPL Investigation

- Collection of samples to provide additional LNAPL characterization information.
- Finalize memos summarizing the results of Transmissivity Study, former Factory 31 Basement Investigation, and AOI 83/84-3 Lead Soil Investigation.

Task 3 LNAPL Recovery Bench and Field-Scale Testing

- Complete evaluation of Site data to aid in selecting methods and locations for additional LNAPL pilot testing.
- Develop a matrix of remedial alternatives and costs for LNAPL areas and meet with EPA to review.

Task 8 NPDES PLUS Monitoring

- Perform upgradient and downgradient sampling in association of the February NPMP monitoring event.

Task 9 RCRA Closures, Well Abandonment, Restrictive Covenants, Resolve UST Issues

- Prepare memo summarizing the results of the WMU #3 Investigation.
- Coordinate with the EPA and MDEQ to transfer open LUST issues to RCRA Corrective Action.

Task 10 Maintain Select Surface Covers

- Sample and characterize the AOI 09-B soil pile.
- Install additional cover as required.

Task 11 Lead Soil Removal

- Coordinate lead soil removal activities.

Task 13 Outfall 002/005 Oil Minimization & Investigation

- Complete bulkhead activities along the Outfall 002, 003, 005 and 007 storm sewers.
- Complete evaluation of possible re-routing options for Outfall 004 storm sewer.

Task 14 Address 15 Areas of Subsurface LNAPL

- Conduct startup and shakedown of AOI-9B LNAPL remediation system.

5. Estimated Percent Complete

Task 1 Outfall 003/004 Oil Removal Systems

- Outfall 003/004 Oil removal System OM&M - Ongoing

Task 2 LNAPL Investigation

- LNAPL LIF Investigations – 100%
- Outfall 003 boom study – 85%
- Southend Natural Source Zone Depletion Study – 75%
- Southend Transmissivity Testing – 100%

Task 3 LNAPL Recovery Bench and Field-Scale Testing

- LNAPL Bench Scale Testing – 100%
- LNAPL Pilot Scale Testing – 33%

Task 7 Enhanced Groundwater Monitoring

- Groundwater Monitoring – Ongoing

Task 8 NPDES PLUS Monitoring

- NPDES PLUS Monitoring – Ongoing

Task 9 RCRA Closures, Well Abandonment, Restrictive Covenants, Resolve UST Issues

- Northend RCRA WMU Closures – 90%
- Southend RCRA WMU Closures – 90%
- Northend Restrictive Covenant – 0%
- Southend Restrictive Covenant – 90%
- Monitoring Well Abandonments – 5%
- UST Issue Resolution – 10%

Task 10 Maintain Select Surface Covers

- Maintain Select Surface Covers – Ongoing
- Installation of Additional Surface Cover – Southend – 15%

Task 11 Lead Soil Removal

- Lead Soil Removal – 15%

Task 12 Agency Coordination/Negotiation, Reporting, Project Management

- RFI Phase I Report - 100%
- RFI Phase II Report - 100%
- Human Health Exposure Control EI Report - 100%
- CA 750 Report - 100%
- Revised Corrective Measures Proposal (CMP), May 1, 2008 – 100%
- Revised CMP Addendum No. 1 – 100%
- Southend Corrective Measures Implementation (CMI) Work Plan – 100%

- Revised CMP Addendum No. 2 – Northend and Sitewide Groundwater - 100%
- Revised CMP Addendum No. 2-1 – Response to EPA Comments - 100%

Task 13 Outfall 002/005 Oil Minimization & Investigation

- Outfall 002 Evaluation - 100%
- Outfall 005 Evaluation – 100%
- Outfall 002 Final Measure Implementation– 10%
- Outfall 003 Final measure Implementation – 5%
- Outfall 005 Final Measure Implementation – 10%

Task 14 Address 15 Areas of Subsurface LNAPL

- Address 15 Areas of LNAPL – 7%
 - AOI 09-B System Design – 100%
 - AOI 09-B Permitting – 100%
 - AOI 09-B System Construction – 95%

Task 15 LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation

- LNAPL Recovery OM&M – 5%
- Secondary LNAPL Remediation – 0%

6. Budget Status

- 2013 Budget – The 2013 Budget Request has been approved by the EPA.



If you have any questions, please call me.

Sincerely,
ARCADIS

A handwritten signature in blue ink that reads "Micki M. Maki".

Micki Maki, P.E.
Project Manager

Copies:

Peter Quackenbush, Michigan Department of Environmental Quality, (via email)
William Yocum, Michigan Department of Environmental Quality (via email)
Flint Public Library
Grant Trigger, RACER Trust (via email)
Dave Favero, RACER Trust (via email)

Attachments:

Attachment 1 – October 2012 Project Update - RACER Buick City Site
Attachment 2 – November 2012 Project Update - RACER Buick City Site
Attachment 3 – December 2012 Project Update - RACER Buick City Site



Attachment 1

October 2012 Project Update
RACER Buick City Site
Flint, Michigan



ARCADIS G&M of Michigan, LLC
10559 Citation Drive
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Tel 810 229 8594
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MEMO

To:
Chris Black, USEPA

Copies:
Grant Trigger, RACER
Dave Favero, RACER
Micki Maki, ARCADIS

From:
Chris Peters

Date:
November 14, 2012

ARCADIS Project No.:
B0064410.2012

Subject:
October 2012 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this October 2012 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from October 1, 2012 through October 31, 2012.

Task 1 - Outfall 003/004 Oil Removal Systems

Routine Work

- Continued operations, maintenance, and monitoring (OMM) activities on the 003/004 system. Inspections are being performed once per week to ensure that the system is running properly and to determine if any system modifications are warranted to optimize system performance.

Non - Routine Work

- Plan and schedule system annual maintenance and cleanout.

Task 2 - LNAPL Investigation

Routine Work

- No work performed.

Non - Routine Work

- Coordinated final LIF investigation of step out locations to be completed November 1 - 2, 2012.
- Maintained absorbent booms at several onsite manholes along the Outfall 003 storm sewer system.
- Began preparing a draft memo summarizing the results of the Transmissivity Study data.
- Completed third quarter of the Natural Source Zone Depletion (NSZD) Study.
- Completed the soil borings for the former Factory 31 basement investigation and began evaluation of analytical data.
- Completed the AOI 83/84-3 Lead Soil Investigation and began evaluation of analytical data.

Task 3 - LNAPL Recovery Bench and Field-Scale TestingRoutine Work

- No work performed.

Non - Routine Work

- No work performed.

Task 4 - Operate Fact. 10 LNAPL/GW System

- Task Completed.

Task 5 - Operate Fact. 36 LNAPL/GW System

- Task Completed.

Task 6 - Maintain Booms on OutfallsRoutine Work

- Performed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Dispose of waste as necessary.
- Performed inspections of Oil Interceptor #2.

Non - Routine Work

- No work performed.

Task 7 - Enhanced Groundwater MonitoringRoutine Work

- Continued coordinating with adjacent property owners for access to complete the annual groundwater sampling event. RACER is currently working with DuPont to obtain access.
- Completed monitoring well repairs, installation, and development in preparation of the annual groundwater sampling event.
- Submitted a memo to the EPA documenting the modifications to the annual groundwater monitoring event based on the monitoring wells that were lost as a result of demolition activities.
- Continued planning for the 2012 annual groundwater monitoring event. This event is scheduled to be completed in November.

Non - Routine Work

- No work performed.

Task 8 - NPDES PLUS MonitoringRoutine Work

- Completed the monthly NPDES Plus Monitoring event for October.

Non - Routine Work

- Began evaluation of GSI criteria and potential sampling reduction.

Task 9 - RCRA Closures, Well Abandonment, Restrictive Covenants, Resolve UST IssuesRoutine Work

- No work performed.

Non - Routine Work

- Discussed status of the Northend and Southend WMU Closure reports with MDEQ. The MDEQ indicated that the reports were still under review.
- Began reviewing the WMU #3 analytical data.

Task 10 – Maintain Select Surface CoversRoutine Work

- Performed quarterly select surface cover inspections.

Non - Routine Work

- Finalized Select Surface Cover Work Plan and responded to EPA comments on the Work Plan.
- Developed options for 2012/2013 implementation of the select surface cover plan.

Task 11 - Lead Soil Removal

Routine Work

- No work performed.

Non - Routine Work

- AOI 09-A Soil Removal Work Plan was submitted to CSX and EPA for review.
- Completed Northern Parcel sampling event and began review of analytical data.

Task 12 - Agency Coordination/Negotiation, Reporting, Project Management

Routine Work

- Prepared Monthly EPA update memo.

Non - Routine Work

- Continued development of 2013 budget and scopes of work.
- Completed quarterly invoice certification.
- Met with MDEQ personnel onsite for NPDES/Stormwater inspection.

Task 13 - Outfall 002/005 Oil Minimization & Investigation

Routine Work

- Not Applicable.

Non - Routine Work

- Continued inspections of absorbent booms in onsite manholes of the Outfall 002 storm sewer system.
- Drafted Addendum #1 to the Outfall 002/005 Bulkheading Work Plan.
- Met with the City of Flint to address water lines and storm sewers issues onsite.

Task 14 - Address 15 Areas of Subsurface LNAPL

Routine Work

- Not Applicable.

Non - Routine Work

- Completed construction of the AOI 09-B MPE treatment system.

Task 15 - LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation

Routine Work

- Not Applicable.

Non - Routine Work

- Continued to address gas line installation issues with Consumers Energy.
- Coordinated start-up of the treatment system. Due to issues with natural gas connection, only a 'soft' startup of the system has been completed. During the start-up the system and all of the connections were inspected. The technician for the thermal oxidizer identified that Consumers Energy had installed the wrong reducer for the natural gas line and that there was not sufficient gas to start-up the system. The system will not be able to be started until the Consumers Energy installs the proper reducer for the natural gas line.



Attachment 2

November 2012 Project Update
RACER Buick City Site
Flint, Michigan



ARCADIS G&M of Michigan, LLC
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MEMO

To:
Chris Black, USEPA

Copies:
Grant Trigger, RACER
Dave Favero, RACER
Micki Maki, ARCADIS

From:
Chris Peters

Date:
December 14, 2012

ARCADIS Project No.:
B0064410.2012

Subject:
November 2012 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this November 2012 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from November 1, 2012 through November 30, 2012.

Task 1 - Outfall 003/004 Oil Removal Systems

Routine Work

- Continued operations, maintenance, and monitoring (OMM) activities on the 003/004 system. Inspections are being performed once per week to ensure that the system is running properly and to determine if any system modifications are warranted to optimize system performance.

Non - Routine Work

- Perform maintenance event on the BaySeparator system.
- Began performing maintenance of the Outfall 003/004 oil/water separator. Upon entering the oil/water separator a large quantity of solids were encountered. Maintenance was halted, while characterization, profiling, and disposal of this additional waste stream could be completed.

Task 2 - LNAPL Investigation

Routine Work

- No work performed.

Non - Routine Work

- Completed final LIF investigation of step out locations.
- Maintained absorbent booms at several onsite manholes along the Outfall 003 storm sewer system.
- Began preparing a draft memo summarizing the results of the Transmissivity Study data.
- Completed evaluation of the Factory 31 basement investigation analytical data and began drafting a memo outlining the results.
- Completed evaluation of the AOI 83/84-3 Lead Soil Investigation analytical data and began drafting a memo outlining the results.

Task 3 - LNAPL Recovery Bench and Field-Scale Testing

Routine Work

- No work performed.

Non - Routine Work

- Reviewed data and developed options for pilot testing/ remediation solutions for AOI's. Identify additional data needs.

Task 4 - Operate Fact. 10 LNAPL/GW System

- Task Completed.

Task 5 - Operate Fact. 36 LNAPL/GW System

- Task Completed.

Task 6 - Maintain Booms on Outfalls

Routine Work

- Performed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Dispose of waste as necessary.
- Performed inspections of Oil Interceptor #2.

Non - Routine Work

- No work performed.

Task 7 - Enhanced Groundwater MonitoringRoutine Work

- Completed the 2012 Annual Groundwater Monitoring event.
- Installed tamper resistant bolts at wells included in the annual sampling program, where possible.
- Evaluated repairs to surface completions at wells in the annual sampling program which could not be secured using tamper resistant bolts.

Non - Routine Work

- No work performed.

Task 8 - NPDES PLUS MonitoringRoutine Work

- Completed the monthly NPDES Plus Monitoring event for November.

Non - Routine Work

- Continued evaluation of GSI criteria and potential sampling reduction.

Task 9 - RCRA Closures, Well Abandonment, Restrictive Covenants, Resolve UST IssuesRoutine Work

- No work performed.

Non - Routine Work

- Discussed status of the Northend and Southend WMU Closure reports with MDEQ. The MDEQ indicated that the reports were still under review.
- Continued drafting summary memo of 12 historic Leaking Underground Storage Tank (LUST) releases to facilitate transfer to RCRA Corrective Action.
- Completed reviewing the WMU #3 analytical data and began drafting a memo outlining the results.
- Coordinated abandonment of 10 wells on CSX property.

Task 10 – Maintain Select Surface CoversRoutine Work

- No work performed.

Non - Routine Work

- Submitted options for 2012/2013 implementation of the select surface cover plan to the EPA.

Task 11 - Lead Soil RemovalRoutine Work

- No work performed.

Non - Routine Work

- Received the EPA's approval of the AOI 09-A Soil Removal Work Plan. Corresponded with CSX regarding the work plan.
- Reviewed Northern Parcel analytical data and prepared draft results memo.

Task 12 - Agency Coordination/Negotiation, Reporting, Project ManagementRoutine Work

- Prepared the Monthly EPA update memo.

Non - Routine Work

- Completed development of the 2013 budget and scopes of work.

Task 13 - Outfall 002/005 Oil Minimization & InvestigationRoutine Work

- Not Applicable.

Non - Routine Work

- Continued inspections of absorbent booms in onsite manholes of the Outfall 002 storm sewer system.
- Drafted Addendum #1 to the Outfall 002/005 Bulkheading Work Plan.
- Met with the City of Flint to address potential Outfall 004 sewer re-route options.
- Developed options for re-routing the Outfall 004 sewer upgradient of the site. Discuss the viability of the options with the City of Flint.
- Planned initial field investigation to determine the viability of re-routing outfall 004 sewer.

Task 14 - Address 15 Areas of Subsurface LNAPL

Routine Work

- Not Applicable.

Non - Routine Work

- Not Applicable.

Task 15 - LNAPL Recovery OM&M Followed by Secondary LNAPL Remediation

Routine Work

- Not Applicable.

Non - Routine Work

- Continued to address gas line installation issues with Consumers Energy. The system will not be able to be started until the Consumers Energy installs the proper reducer for the natural gas line.



Attachment 3

December 2012 Project Update
RACER Buick City Site
Flint, Michigan



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MEMO

To:
Chris Black, USEPA

Copies:
Grant Trigger, RACER
Dave Favero, RACER
Chris Peters, ARCADIS

From:
Micki M. Maki

Date:
January 11, 2013

ARCADIS Project No.:
B0064410.2012

Subject:
December 2012 Project Update - RACER Buick City Site, Flint, Michigan

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, ARCADIS is submitting this December 2012 Project Update to provide a brief summary of work performed at the Buick City Site (the Site) from December 1, 2012 through December 31, 2012.

Task 1 - Outfall 003/004 Oil Removal Systems

Routine Work

- Continued operations, maintenance, and monitoring (OMM) activities on the 003/004 system. Inspections are being performed once per week to ensure that the system is running properly and to determine if any system modifications are warranted to optimize system performance.

Non - Routine Work

- Completed performing the Outfall 003/004 oil/water separator annual maintenance event. Activities including removing and disposing of collected materials; and pressure washing and inspecting the oil/water separator and coalescer plates prior to placing the system back online.

Task 2 - LNAPL InvestigationRoutine Work

- No work performed.

Non - Routine Work

- Maintained absorbent booms at several onsite manholes along the Outfall 003 storm sewer system.
- Drafted memo summarizing the results of the Transmissivity Study data.
- Reviewed data and prepared a draft memo summarizing the status of the AOI 83/84-3 investigation.
- Reviewed data from the NSZD results. Due to issues at the laboratory, the third quarter results were delayed. The fourth quarter sampling event has been postponed until the data from the third quarter event is received and reviewed.
- Drafted figure showing all of the LIF boring locations.

Task 3 - LNAPL Recovery Bench and Field-Scale TestingRoutine Work

- No work performed.

Non - Routine Work

- No work performed.

Task 4 - Operate Fact. 10 LNAPL/GW System

- Task Completed.

Task 5 - Operate Fact. 36 LNAPL/GW System

- Task Completed.

Task 6 - Maintain Booms on OutfallsRoutine Work

- Performed inspections and maintenance (as necessary) of Outfalls 002, 003, 004, and 005. Dispose of waste as necessary. The inspection frequency was increased during the time that the Outfall 003/004 BaySeparator system was offline for maintenance.

- Performed inspections of Oil Interceptor #2.

Non - Routine Work

- No work performed.

Task 7 - Enhanced Groundwater Monitoring

Routine Work

- Installed tamper resistant bolts at wells included in the annual sampling program, where possible.
- Began review of compiling field data from annual groundwater monitoring event.
- Submitted notifications to offsite property owners as required by the access agreements.

Non - Routine Work

- No work performed.

Task 8 - NPDES PLUS Monitoring

Routine Work

- Completed the monthly NPDES Plus Monitoring event for December.

Non - Routine Work

- No work performed.

Task 9 - RCRA Closures, Well Abandonment, Restrictive Covenants, Resolve UST Issues

Routine Work

- No work performed.

Non - Routine Work

- Discussed status of the Northend and Southend WMU Closure reports with MDEQ. The MDEQ indicated that the reports were still under review.
- Continued drafting summary memo of 12 historic Leaking Underground Storage Tank (LUST) releases to facilitate transfer to RCRA Corrective Action.
- Completed reviewing the WMU #3 analytical data and began drafting a memo outlining the results.
- Completed the abandonment of seven monitoring wells on CSX property.

Task 10 – Maintain Select Surface Covers

Routine Work

- No work performed.

Non - Routine Work

- Performed quarterly surface cover inspections.
- Completed AOI 29-A soil boring investigation.
- Began drafting select surface cover request for proposal (RFP).
- Addressed the EPA's comments for the 2012/2013 implementation of the select surface cover plan.

Task 11 - Lead Soil Removal

Routine Work

- No work performed.

Non - Routine Work

- Began development of the AOI 09-A soil removal RFP and air monitoring plan.
- Completed Draft Northern Parcel memo and submitted to RACER for review.

Task 12 - Agency Coordination/Negotiation, Reporting, Project Management

Routine Work

- Prepared the Monthly EPA update memo.

Non - Routine Work

- Performed a health and safety audit of the site and the ongoing activities.

Task 13 - Outfall 002/005 Oil Minimization & Investigation

Routine Work

- Not Applicable.

Non - Routine Work

- Continued inspections of absorbent booms in onsite manholes of the Outfall 002 storm sewer system.

- Began investigating options for re-routing the Outfall 004 storm sewer near the upgradient Site property boundary. Activities included conducting surveying and videoing of portions of storm sewer 004, 005, and 013 alignments.
- Completed bid solicitation and subcontractor selection for the 002/005 bulkheading request for proposal.

Task 14 - Address 15 Areas of Subsurface LNAPLRoutine Work

- Not Applicable.

Non - Routine Work

- Not Applicable.

Task 15 - LNAPL Recovery OM&M Followed by Secondary LNAPL RemediationRoutine Work

- Not Applicable.

Non - Routine Work

- Continued to address gas line installation issues with Consumers Energy. The system will not be able to be started until the Consumers Energy installs the proper reducer for the natural gas line.